

# Morgan Lewis

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April 13, 2021

**Via ECF**

**MEMO ENDORSED**

The Honorable Sidney H. Stein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Romero v. Colgate-Palmolive Company, No. 1:20-cv-09216-SHS**  
**Request to Extend Stay and Adjourn Conference**

Dear Judge Stein:

We represent defendant Colgate Palmolive Company ("Defendant") in the above-referenced action. Pursuant to Your Honor's Individual Practices, we write with the consent counsel for Plaintiff Josue Romero ("Plaintiff"), respectfully to request that the Court (a) stay all pending deadlines in this case for an additional 30 days, and (b) adjourn the Initial Conference scheduled for April 16, 2021 to a date and time after the 30 day stay that is convenient to the Court. In support of this request, counsel for Defendant states that this request is needed for the parties to comply with the terms of their agreement and the parties anticipate filing the stipulation of dismissal on or before May 1, 2021. This is Defendant's second request to stay deadlines to permit the parties to finalize the terms of their agreement and submit a stipulation of dismissal. The Court granted each of the prior requests. As noted above, Plaintiff's counsel consents to this request.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Michael F. Fleming

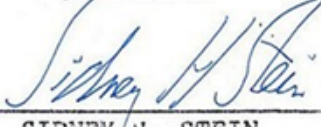
Michael F. Fleming

*Attorney for Defendant*

cc: All Counsel of Record (via ECF)

**The last day for defendant to respond to the complaint is extended to May 13, 2021, at 11:00 a.m. The pretrial conference is adjourned to May 13 at 10:00 a.m.**

**Dated: New York, New York**  
**April 13, 2021**

SO ORDERED  
  
SIDNEY H. STEIN  
U.S.D.J.

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